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7 KENNETH WAYNE FROUDE

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 KENNETH WAYNE FROUDE,
15 Defendant.

NO. CV 15-8623-JLS-E

**STIPULATION TO CONTINUE
HEARING AND MODIFICATION
OF BRIEFING SCHEDULE**

17 IT IS HEREBY STIPULATED AND AGREED TO by and between Plaintiff,
18 United States of America, by and through its attorney of record, Assistant United States
19 Attorney Nathaniel B. Walker, and defendant Kenneth Wayne Froude, by and through
20 his attorney of record, Deputy Federal Public Defender Marisol Orihuela, that the
21 Extradition hearing be continued from February 11, 2016, at 9:30 a.m., to April 11,
22 2016, at 9:30 a.m.

23 IT IS FURTHER STIPULATED that the briefing schedule be modified as
24 follows:

25 Government's Opening Brief be filed on or before:	March 14, 2016
26 Defendant's Opposition Brief be filed on or before:	March 21, 2016
27 Government's Reply Brief be filed on or before:	March 28, 2016
28	

1 This stipulation is based on the files and records of this case and the following
2 representations:

3 1. On November 18, 2015, this Court set a briefing schedule and hearing on
4 this on this matter, ordering that the government file its opening brief on January 14,
5 the defense file its opposition on January 21, and any reply be filed on January 28.

6 2. The defense has been attempting to obtain relevant documents to this
7 matter, including records from Canada, but has not received all documents the defense
8 believes are necessary in order to adequately prepare its brief on this case.

9 3. For this reason, the defense requests additional time to obtain records and
10 prepare its brief on this case. The government does not oppose the defense's request.

11 4. For these reasons, the parties hereby seek a modification of the briefing
12 schedule and a continuance of the hearing in this case until April 11, 2016, at 9:30 .m.
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14 Respectfully submitted,

15 HILARY POTASHNER
16 Federal Public Defender
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18 DATED: January 11, 2016

By /s/ Marisol Orihuela
19 MARISOL ORIHUELA
20 Deputy Federal Public Defender

21 EILEEN M. DECKER
22 United States Attorney

23 DATED: January 11, 2016

By /s/ per e-mail authorization
24 NATHANIEL B. WALKER
25 Assistant United States Attorney
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